

121-244

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

CRYSTAL MICHELLE SILVAS

Plaintiff

V.

HILTON INTERNATIONAL OF PUERTO RICO,
INC. et al.

Defendants.

CIVIL NÚM.: 21-cv-1597 (RAM) (BJM)

**MOTION FOR EXTENSION OF TIME FOR DEFENDANTS' EXPERTS
DISCLOSURES AND RESET OF SETTLEMENT CONFERENCE**

TO THE HONORABLE COURT:

COMES NOW Hilton International of Puerto Rico, LLC, Chubb Insurance Company, and Pool & Spa Technicians, Corp., through the undersigned attorneys, and very respectfully state, allege, and pray as follows:

1. On October 23, 2022 the parties jointly filed an Amended Joint Case Management Memorandum (See Docket 23) which proposed the deadline for Defendants to disclose their expert reports on February 28, 2023.

2. During a hearing held on December 1, 2022, the Court adopted the proposed case management schedule. See Docket 29. Court referred the case to Magistrate Judge Bruce McGiverin for a settlement conference to be held during the month of March, 2023, which was set to be held on March 22, 2023.

3. The parties have engaged in meaningful and significant discovery, which has included the exchange of documentary evidence, a site inspection on the area of the incident, and obtaining documentary evidence from third parties. Plaintiffs' depositions are scheduled to be held

on March 6 and 8. Despite these efforts, Defendants need an extension of the deadline to disclose their experts, until March 31, 2023. This extension would not affect the discovery deadline, nor the other deadlines in the case management schedule. This request was discussed with plaintiffs' counsel, who informed having no objection to it.

4. A settlement conference was set on March 22, 2023. The purpose of that settlement conference was to give the parties opportunity to explore the settlement possibility with the benefit of all the parties' expert's opinion disclosed. Consequently, it is respectfully requested that the settlement conference be reset to a date after defendants have disclosed their expert reports. Appearing defendants propose the dates of April 25, May 2 or 3 of 2023 as alternative dates available for all the parties for the settlement conference to be held.

WHEREFORE, it is respectfully requested that for the reasons stated above, this Honorable Court grant the appearing party an extension until March 31, 2023 to make their expert disclosures and reset the settlement conference to a later date.

In San Juan, Puerto Rico, this February, 27, 2023

I HEREBY CERTIFY that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the Court's CM/ECF system, which will send notice of its filing electronically to the attorneys of record.

Respectfully submitted,

s/Héctor A. Mármol-Lantigua
HÉCTOR A. MÁRMOL-LANTIGUA
USDC-PR 225404
hmarmol@colonramirez.com

S/FRANCISCO E. COLÓN-RAMÍREZ
FRANCISCO E. COLÓN-RAMÍREZ
BAR NO.: 210510
E-mail: fecolon@colonramirez.com

COLÓN RAMÍREZ LLC

PO Box 361920

San Juan, PR 00936-1920

Tel.: (888) 760-1077

Fax: (305) 507-1920

MARTÍNEZ CHEVRES

— Law Office

P.O. Box 190790

San Juan, PR 00919-0790

Tel. (787) 963-0100

jmc@martinezchevres.com

s/José M. Martínez Chevres

José M. Martínez Chevres

USCD-PR 301002